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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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Federal Communications Commission
Office of Secretary

In the Matter of)

Tariff Streamlining Provisions)
of the Telecommunications Act of 1996)
_____)

CC Docket No. 96-187

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COMMENTS OF COMMUNICATIONS
IMAGE TECHNOLOGIES, INC.

Communications Image Technologies, Inc. ("CITI"), by its undersigned counsel,
hereby submits these comments in support of the Commission's Notice of Proposed
Rulemaking ("NPR"), issued on September 6, 1996, in the reference matter. CITI
comments
specifically on the electronic filing provisions of the NPR, ¶¶ 21-22, at pp. 10-11.

I. INTRODUCTION

CITI is an information technology and document management company
specializing in telecommunications document management and research as well as
electronic document conversion and dissemination. It offers these services, as well as
innovative computer networking solutions and support to telecommunications carriers,
government agencies and private institutions and companies. CITI is experienced with
electronic filing and retrieval systems. CITI is familiar with various government

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electronic filing systems maintained by independent contractors, including such systems for the Securities and Exchange Commission and the Office of Patents and Trademarks. CITI believes that the FCC is moving toward electronic filing and retrieval at a time when it can benefit from advances in technology, and the experiences of other agencies and commissions, including this Commission's own experience with early tests of electronic filing processes.

CITI supports the Commission's plans to provide for electronic filing of "tariffs, tariff transmittal letters and tariff support" in a manner that provides for timely public access. The Commission's initiative promises to provide the telecommunications industry and other users with a system that accommodates real time access, more efficient evaluation of tariff filings and enhanced response time to Commission notices.

As described below, CITI believes that any electronic filing system must be carefully designed to assure that it will meet future growth as well as current needs; to assure the standardization necessary to user friendly access; and to assure that one entity is responsible for system integrity and security. To accomplish these goals, CITI believes that the Commission should avail itself of industry experience and expertise. In short, it is essential to coordinate industry input to marshal the expertise necessary to design a flexible system and to manage that system for the benefit of the Commission and its users, and to assure the integrity and security of that system.

CITI therefore recommends that the Commission appoint an industry working group comprised of representatives from both large and small interexchange carriers, a Bell operating company representative, a competitive access carrier representative, Commission staff, and technical experts such as CITI. This working group should be charged with making recommendations concerning the functional requirements of the electronic filing system including standardized features and options for providing access to electronically filed information. Because each of these representatives has experience working with electronic filings, at the Commission and in other fora, the working group's mission should take no longer than six weeks.

II. AN ELECTRONIC FILING SYSTEM MUST BE CAREFULLY DESIGNED AND MANAGED

The Commission would be well-advised to avail itself of industry expertise in the electronic filing, document and database management, imaging, and network design area before adopting an electronic tariff filing system that may marginally meet its needs today, but will almost certainly fail to meet its needs tomorrow. As one of the experienced leaders in this area, aware of the filing requirements of Carriers, the public, and the Commission, CITI is well aware that the best intentioned electronic filing system can become a costly albatross if not well-planned, developed and centrally

maintained. For this reason CITI recommends the design of a system that is configured, from the outset, in a manner that will accommodate the electronic filing of virtually all documents filed with the Commission.

CITI also believes that once developed, system maintenance will be critical. By placing system management responsibilities not on Commission staff or diversely trained carrier staff, but on experts trained in the management of and access to complex databases, system security and integrity of the filing and retrieval system will be assured. Although users should be permitted to file their own documents and to access information, access to the system for any other purposes must be more limited. Moreover, newly filed documents should be maintained in special files and integrated into the relevant database only after the systems administrator has assured compliance with all electronic filing requirements and the filing has passed edit programs necessary to assure system integrity.

Finally, system security entails a variety of requirements. One of the most urgent involves the need to develop a means to assure that the Commission has absolute control over official filings and that these filings are immune from modification or tampering. The Commission should therefore build into its system an electronic signature whereby each electronically filed page is given an official electronic Commission stamp, by the Commission. The document bearing this unique stamp will represent the official filing

and format. Users and viewers of these official documents should be required to print these documents in the identical format so that the official documents and any modified documents are readily distinguishable.

III. THE CHALLENGE OF STANDARDIZATION

Any electronic filing system must include a standardized input and retrieval platform. Without standardization, massive amounts of data may be collected, but its use and dissemination will be inefficient. At the same time, it is important to design a filing and retrieval platform that is not only compatible with existing technologies, but is also flexible enough to incorporate new technologies. Without such a design, initial efforts toward standardization will soon be defeated.

For example, it is important that the Commission adopt an input format that is compatible with all user and viewer computer platforms (IBM, Macintosh, Unix, etc.) and yet maintains a proper standardized format for print and retrieval purposes. CITI recommends the Adobe Portable Document File (.PDF format) as one solution to satisfying this requirement.

The Commission's experience with nondominant interexchange carrier filings illustrates a further point that must be addressed by the new system. Nondominant

interexchange carriers are required to file tariffs on disk, using a DOS format, WordPerfect 5.1. Every time these carriers have made a change to their tariffs, they have been required to file a complete revised tariff. For some carriers, each filing has entailed filing 13–14 diskettes. Because each carrier uses different fonts, and page formats, retrieval of these tariffs has often produced confusion. Moreover, under this system, users can not readily discern modifications to the tariff, and because full text search capabilities are limited, can not readily evaluate the impact of particular modifications upon other tariff provisions.

Thus, it is important that the Commission's efforts to design an electronic filing system be carefully planned to accomplish the overriding purpose of efficient information retrieval. This can best be accomplished through careful initial design and system maintenance by experts like CITI. The EDGAR system operated by the Securities and Exchange Commission is in many respects a good model for this Commission to emulate. The EDGAR system provides for regulated entities to enter documents into the system, permits virtually real-time access to these documents by the public, is accessible via the Internet as well as through private contractors, and makes available large amounts of complex information in a readily-searchable and standardized format.

IV. CONCLUSION

CITI supports the Commission's plan to provide for electronic filings and urges the Commission to undertake the advance planning necessary to develop a system that assures that the information filed can be efficiently retrieved and maintained. Toward this end, CITI urges the Commission to retain an expert in the field to assist in system development, operation, and maintenance. This approach will expedite development, foster accountability and provide the Commission with a potential source of revenue rather than a drain on its resources.

Respectfully submitted,

COMMUNICATIONS IMAGE
TECHNOLOGIES, INC.

By: 

Andrew D. Lipman
C. Joel Van Over
SWIDLER & BERLIN
3000 K Street, NW
Suite 300
Washington, DC 20007
Tel (202) 424-7500
Fax (202) 424-7643

*Attorneys for Communications
Image Technologies, Inc.*

Dated: October 9, 1996.